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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	
	§	<b>CASE NO. 22-40421-ELM13</b>
<b>DIANNE LOUISE DORMAN</b>	§	
<b>DEBTOR(S)</b>	§	<b>CHAPTER 13</b>

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now PHH Mortgage Corporation, as servicer for DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee for SECURITIZED ASSET BACKED RECEIVABLES LLC TRUST 2007-NC1, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-NC1 (hereinafter referred to as "PHH Mortgage Corporation"), a secured creditor in the above-entitled and numbered case, filing this its Objection to Confirmation of Chapter 13 Plan, and in support hereof represents:

1. The above-styled Debtor(s) filed a voluntary petition under Chapter 13 of Title 11, United States Bankruptcy Code, on February 28, 2022.
2. Debtor(s) is indebted to PHH Mortgage Corporation pursuant to a promissory note secured by a recorded instrument granting a security interest in the real property with the address of 100 Ascot Dr, Southlake, Texas 76092 (the "Property").
3. The Property is the Debtor(s)' principal residence.
4. PHH Mortgage Corporation anticipates on filing a secured proof of claim in the amount of \$677,822.06, with pre-petition arrearages in the amount of \$565,808.58 (the "Claim").
5. PHH Mortgage Corporation objects to confirmation of Debtor(s) Chapter 13 Plan (the "Plan") because as proposed it understates the pre-petition arrearage portion of the Claim.

WHEREFORE, PREMISES CONSIDERED, PHH Mortgage Corporation prays that this Court deny confirmation of the Plan proposed by the Debtor(s), and grant PHH Mortgage Corporation such other and further relief at law and in equity as is just.

Respectfully submitted,  
Bonial & Associates, P.C.

/s/ Chandra D. Pryor  
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Attorney for PHH Mortgage Corporation, as servicer for  
DEUTSCHE BANK NATIONAL TRUST COMPANY,  
as Trustee for SECURITIZED ASSET BACKED  
RECEIVABLES LLC TRUST 2007-NC1, MORTGAGE  
PASS-THROUGH CERTIFICATES, SERIES 2007-NC1

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Movant attempted to confer with counsel for Debtor(s) prior to filing this objection and the issues raised herein are not yet resolved.

/s/ Chandra D. Pryor  
\_\_\_\_\_  
Hilary B. Bonial  
Chandra D. Pryor

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in interest either via pre-paid regular U.S. Mail or via electronic notification on or before the 29<sup>th</sup> day of March 2022:

Debtor *Via U.S. Mail*  
Dianne Louise Dorman  
100 Ascot Dr  
Southlake, TX 76092

Debtor's Attorney  
Nicholas C. Inman  
Allmand Law Firm, PLLC  
860 Airport Freeway, Suite 401  
Hurst, TX 76054

Chapter 13 Trustee  
Pam Bassel  
7001 Boulevard 26, Suite 150  
North Richland Hills, Texas 76180

US Trustee  
Office of the U.S. Trustee  
1100 Commerce Street, Room 976  
Dallas, Texas 75202

Linebarger Goggan Blair & Sampson, LLP  
2777 N. Stemmons Freeway, Suite 1000  
Dallas, TX 75207

22-40421-ELM13

/s/ Chandra D. Pryor  
Hilary B. Bonial  
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